

MEMORANDUM

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FLY TO: DP-124
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SUBJECT: Defense Programs Environmental Restoration Program - Draft Program Management Plan

TO: ✓ Manager, Albuquerque Operations Office
Manager, Chicago Operations Office
Manager, Idaho Operations Office
Manager, Nevada Operations Office
Manager, Oak Ridge Operations Office
Manager, Richland Operations Office
Manager, San Francisco Operations Office
Manager, Savannah River Operations Office

The attached final draft of the Environmental Restoration (ER) Program Management Plan, January 6, 1988, and the attachments are transmitted for your information and reference.

The comments and discussion in the ER program working meeting in Denver, December 7-9, 1987, were instrumental in the development of the current draft of the management plan. Its intent is to strike a reasonable balance between the flexibility afforded the field offices and the prescription of detailed program management requirements where necessary. The majority of the comments and guidance from the working teams at the Denver workshop have been incorporated. Changes were made only in cases of conflict between comments or conflict with headquarters responsibilities in the overall management of the program.

Since the current draft was prepared, internal reviews have identified a few areas in need of clarification. In those cases, the subjects are addressed in the attachment, "Pending Changes." It is anticipated that further guidance will be forthcoming regarding details of change control procedures and any other subjects which later may be determined to be appropriate.


Pending final completion of the management plan, implementation of the program should proceed in accordance with the attached final draft. Should your review indicate any significant problems in implementation of the program in accordance with these requirements, you are requested to notify this office immediately.

Your support and the continued cooperation and participation of your ER program representatives in the development of this vital Defense Programs activity are appreciated.

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ADMIN RECCRD

Questions concerning this document may be addressed to Mr. Critz George (FTS 233-3253) of this office, or Mr. Bill Thompson (FTS 624-9426) of the Hazardous Waste Remedial Actions Program Support Contractor Office.


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Office of Defense Waste and
Transportation Management
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2 attachments

1. Draft Program Management Plan
2. Draft Pending Changes

cc w/attach.

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ER Program Management Plan
January 6, 1988, Final Draft
Pending Changes

Note: Page number references below are to the January 6, 1988, "final draft" of the management plan

Page 9, 2nd paragraph: The sentence, "The task elements for the ER Program at Level 3 are the basic planning and reporting units" is correct in its context and as shown in Figure 1, on page 10. However, it must be noted that elsewhere in the document the Field Offices are given the flexibility to define tasks at other levels in the WBS structure if they choose. In any case, the task elements at whatever WBS level they are defined remain the basic planning and reporting units.

Page 12, 3rd paragraph: "Level 3" as stated in the first sentence is incorrect and should be changed to read "Level 2." It should be noted, however, if a Field Office chooses to define a task at the remedial actions phase (WBS Level 2), reporting will be required at that level, as indicated above.

Page 24, item 4, top of page: Additional guidance will be provided to ensure programmatic consistency in the identification of release sites. Provisions for noting the type of waste(s) involved, RCRA/CERCLA phase, map grid coordinates, etc., will be addressed.

Page A-2, "Assessed Value": The second sentence in the definition should be changed to read, "Assessed value...is calculated as the product of the manager's assessment of percent complete times the task total FY budget."

Pages B-2 through B-5, Field Office Monthly Status Report forms: Please substitute the January 14, 1988, revision (copies attached) of the subject forms for those contained in the draft document.

FINAL DRAFT

ENVIRONMENTAL RESTORATION PROGRAM

MANAGEMENT PLAN

JANUARY 6, 1988

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ACRONYM LIST

ASEH	Assistant Secretary of Environment, Safety, and Health
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DOE	Department of Energy
DOT	Department of Transportation
DP	Defense Programs
DWTM	Office of Defense Waste and Transportation Management
EH	Environmental, Safety, and Health
EPA	Environmental Protection Agency
ER	Environmental Restoration
FOLRP	Field Office Long-Range Environmental Management Plan
FOMP	Field Office Management Plan
FOWP	Field Office Current Year Work Plan
HAZWRAP	Hazardous Waste Remedial Actions Program
HQ	Headquarters
HWRAD	Hazardous Waste and Remedial Actions Division
NIH	National Institute of Health
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
PA/SI	Preliminary Assessments and Site Inspection
PCB	Polychlorinated Biphenyls
QA	Quality Assurance
R&D	Research and Development
RCM	RCRA Corrective Measures
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RI/FS	Remedial Investigations and Feasibility Studies
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
TEC	Total Estimated Cost
WAG	Waste Area Group
WIN	Waste Information Network
WBS	Work Breakdown Structure

Note: Appendix A is a glossary of terms used in this report.

ENVIRONMENTAL RESTORATION PROGRAM MANAGEMEN. PLAN

1. MANAGEMENT PLAN OBJECTIVE

This Plan defines the scope of the Department of Energy-Defense Programs (DOE-DP) Environmental Restoration (ER) Program and establishes the management systems needed to shape and focus a consistent Departmental approach. The purpose of the Plan is to enable the concerted execution of timely, cost-effective restoration tasks in compliance with all applicable laws and regulations.

Only those management elements and functions unique and specific to the ER Program are addressed. The Plan establishes systems and procedures responsive to the special nature of ER Program tasks. Routine DOE procedures will be addressed here only as necessary to clarify important distinctions between the demands of this new program and DOE's normal business.

2. PROGRAM OVERVIEW

2.1 PROGRAM OBJECTIVE

The primary objective of the ER Program is to support DOE-DP efforts in identifying and restoring all inactive waste sites at DP installations and in ensuring compliance with applicable laws and regulations in the remediation of the waste sites.

The ER Program budget category was created at the request of the House Armed Services Committee. The Program allows DOE to identify and prioritize the funding requests on a DP-wide basis, and the Program's

structure allows for the assignment of management responsibilities and accountability for all remedial actions tasks. In addition, the Program provides a planning mechanism, a tracking and reporting system, remedial actions technical support, a records management system, and a communications forum.

2.2 PROGRAM DESCRIPTION AND EXCLUSIONS

The tasks addressed by the ER Program are identification, investigation, technology development and demonstration, remedial design and cleanup of past contamination by hazardous substances releases, and installation of postclosure monitoring systems. The Program also includes requirements incidental to remedial actions (e.g., provision of a temporary source of drinking water to off-site residents whose water supply has been contaminated by a release from a DOE-DP site). Emergency response actions to current and future hazardous substance spills will, however, be addressed as needed primarily through the use of operating funds. For clarity, the following discussion uses the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) terminology, although its usage is not intended to exclude Resource Conservation and Recovery Act (RCRA) considerations. (See Table 1 for a comparison of RCRA/CERCLA terminologies.)

In regulatory terms, the Program includes (1) preliminary assessments and site inspections (PAs/SIs), (2) remedial investigations and feasibility studies (RIs/FSSs), and (3) remedial actions at radioactively and nonradioactively contaminated sites that primarily meet the criteria of RCRA 3004(u) or CERCLA and the Superfund Amendments and Reauthorization Act (SARA). Remediations associated with pre-1970 buried transuranic wastes at DOE facilities are also included. The Defense Decontamination

Table 1. Remedial actions process Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act (RCRA/CERCLA) terminology

Generic phase	RCRA	CERCLA
Assessment	RCRA facility assessment (RFA)	Preliminary assessment
Inspection	Included in RFA	Site inspection
Investigation	RCRA facility investigation	Remedial investigation
Feasibility	(Part of RCRA corrective measures)	Feasibility study
Remedial work	RCRA corrective measures	Remedial action
Compliance	Compliance	Compliance

and Decommissioning Program, while part of this budget category, is not covered by this Plan (except for reporting requirements as noted in Sect. 4.2.6.2) because it already has a mature management system in place.

The following types of tasks are included in the ER Program:

1. Investigations to identify, confirm, and quantify contamination; feasibility studies; remedial actions plans and designs; and remedial actions.
2. Technology development and demonstrations necessary to conduct cleanup.
3. Expenses associated with cooperative multiparty clean-up plans and activities.

4. Remedial actions to protect or restore natural resources damaged by contamination from past DP activities that resulted in hazardous substance releases.
5. Installation of long-term environmental monitoring systems.
6. CERCLA assessments necessary before accessing real property assets.
7. RCRA 3004(u) permit provisions associated with solid waste management units that would meet the definition of a past disposal site under CERCLA/SARA.
8. Specific studies and support for risk assessments for hazardous waste remedial actions.
9. RCRA remediation and closure of land units that were operated prior to March 1, 1987.

Limiting the ER Program to cleaning up of contamination from past activities reflects a strategic decision not to reassign responsibility for management of currently generated hazardous wastes that are in active processes and facilities. Treatment, storage, and disposal of these wastes are a part of normal programmatic responsibilities pursuant to the Atomic Energy Act or RCRA. Other exclusions include:

1. building decontamination and decommissioning;
2. RCRA compliance for currently generated waste streams;
3. emergency response to spills and releases;
4. new waste management facilities, except as required as an integral part of remedial actions;
5. routine environmental monitoring and maintenance of monitoring systems; and
6. remediation and closure of land units that were opened after March 1, 1987.

3. PARTICIPANTS AND RESPONSIBILITIES

Table 2 shows the programmatic and task responsibilities for each participant. Sections 3.1-3.5 provide summaries of participant responsibilities.

3.1 DEFENSE PROGRAMS

In accordance with DOE Order 5480.2, the Assistant Secretary for Defense Programs will provide ER Program management guidance as necessary to the Office of Defense Waste and Transportation Management (DWTM). DWTM will administer the Program and have authority over the Hazardous Waste and Remedial Actions Division (HWRAD), which will provide program-level accountability, management, budgeting, and planning. DWTM will also provide summary status reports to senior management.

3.2 ENVIRONMENT, SAFETY, AND HEALTH

Environment, Safety, and Health (EH) will (1) provide guidance to DP regarding compliance and DOE-wide consistency, (2) participate in negotiations for compliance policy, (3) assist in resolution of national issues, and (4) concur on draft Records of Decision (RODs).

3.3 STANDING COMMITTEES AND ADVISORY GROUPS

Standing committees and advisory groups will provide program guidance, concurrence, and support. Standing committees may include ER Program representation from each field office, with subcommittees (including national experts) for prioritization and technical review, budget

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Environmental Restoration Program

evaluation, program redirection, or support needs. Organizations such as the National Academy of Sciences or other similar independent established organizations may provide credible review and evaluation.

3.4 FIELD OFFICES

Field offices will be responsible for implementing management systems in accordance with DP guidance, identifying tasks, submitting prioritized task lists for budget consideration, planning for long-range goals, managing remediation tasks, reporting status to DP, negotiating with applicable regulators, coordinating community relations programs, reallocating funds within lists of approved tasks, and preparing and submitting all required documentation. Each field office will have an ER Program Manager designated as the primary contact for programmatic communications.

3.5 HAZARDOUS WASTE REMEDIAL ACTIONS PROGRAM/OAK RIDGE

The Hazardous Waste Remedial Actions Program/Oak Ridge (HAZWRAP/OR) has responsibility for DOE DP-wide hazardous and mixed waste remedial actions support. HAZWRAP/OR will provide the ER Program with administrative and technical support in developing program-level plans, training, assisting in consolidating field office budget submittals, developing presentations, developing and maintaining reporting and historical data systems, reviewing and consolidating reports, preparing summary reports, assisting in technical reviews, and providing for technology transfer.

4. PROGRAM IMPLEMENTATION

4.1 MANAGEMENT STRATEGY

Because remedial actions activities are inherently investigatory and exploratory in the initial phases and, as such, must be able to accommodate a unique set of uncertainties both technically and budgetarily, ER tasks must be managed with a greater degree of flexibility than conventional government construction projects. Because DOE will not be in complete control of the technical scope, cost, and schedule of remedial actions tasks before the ROD, ER management must have administrative flexibility to deal with external regulatory authorities in a timely and responsive manner. The Environmental Protection Agency (EPA) and the various state regulatory bodies will be in a position to prescribe what needs to be done and to establish deadlines. This, in turn, will greatly influence resource requirements and schedules. The regulatory agencies have proved unwilling to accept the 3- to 5-year budget cycle involved in conventional capital projects.

The unique constraints and uncertainties associated with remedial actions render strict conformance to the requirements of DOE Order 4700.1, "Project Management System," neither feasible nor desirable. This is especially true in the case of major systems acquisitions requirements. Therefore, an alternative management approach that provides the appropriate systems for management control must be used for ER Program tasks. It is intended that these systems provide a functional equivalency to 4700.1, while addressing the special needs of the ER Program. These systems provide criteria for key management involvement in such critical success factors as justification and approval of all task starts, change control based on cost and schedule variances, performance to established milestones, cost trend analysis, and conformance to established long- and short-range plans. These criteria are detailed in the following sections.

4.2 MANAGEMENT SYSTEMS

4.2.1 Work Breakdown Structure

The ER Program work breakdown structure (WBS) has levels ranging from the various responsible program office divisions to the actual hazardous waste release site in the field. This structure is depicted in Fig. 1.

This Plan addresses the Remedial Action branch of HWRAD. The WBS provides considerable flexibility for structuring work packages by individual field offices. The task elements for the ER Program at Level 3 are the basic planning and reporting units. A task has two very important characteristics, both of which relate to flexibility. First, Level 3 is the lowest level at which costs must be reported to HQ. The size of a task may vary at the discretion of the field office. Second, a task may be redefined as a remedial action progresses through prescribed regulatory phases (i.e., PAs/SIs and RIs/FSs), which are indicated at Level 2.

The size of a task, as quantified by either the planning cost estimate or total estimated cost (TEC), depending on the remedial process phase involved, will determine the level of DOE management at which accountability and approval reside. The larger the task, the higher the level of management involved. The task size hierarchy is shown in Table 3. Thus, two factors compete to moderate the size of a task: excessive reporting detail (from a large number of small tasks) and involvement of upper levels of DOE management (from a small number of large ones).

A number of other factors may be used by a field office to determine the size of a task. Several recognized factors are listed below.

Possible factors used to determine the size of a task

Geography (e.g., installation or facility boundaries)

Hydrology

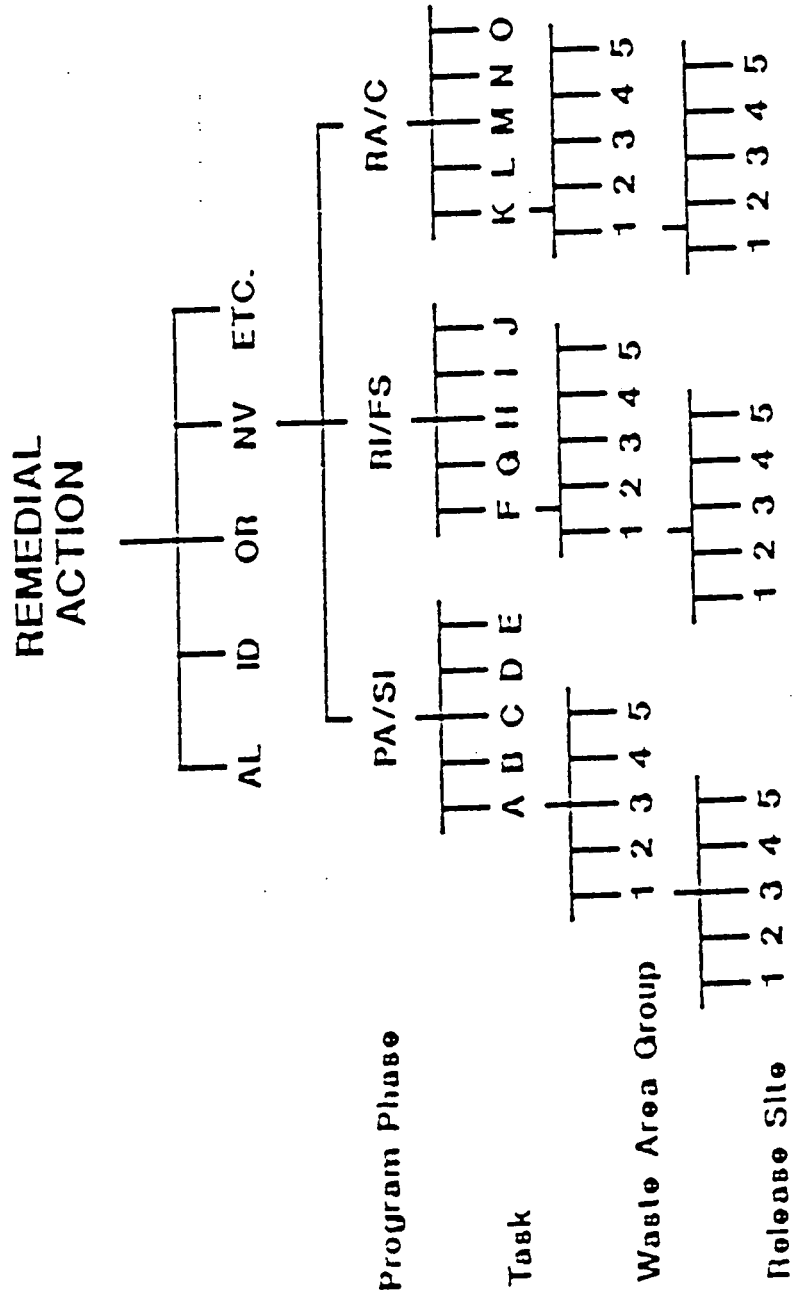


Fig. 1. Work breakdown structure.

Table 3. Environmental Restoration Program task size hierarchy

Task size descriptor	Planning cost estimate or total estimated cost (SM)
Very large	>200
Large	50-200
Medium	15-50
Small	<15

Consistency with regulations

Funding budget and reporting codes

Facilitation of DP control (e.g., DOE Order 4700.1 influence,
leveling of funding among activities)

Reference to National Priorities List ranking

Maximization of field office flexibility

Specialized needs (e.g., polychlorinated biphenyls focus and
technology demonstrations)

Minimization of monthly reporting effort

Given the flexibility allowed in defining the size of a task, the ER Program office may not receive enough detail on some tasks to track overall remedial actions progress in a consistent manner that lends itself to responding to inquiries from the DOE ES&H organization, the Office of Management and Budget (OMB), and Congress. To decrease this possibility, regular reporting of status and progress is required at the lower levels of the WBS, perhaps at the waste area group (WAG) level initially. A WAG is a logical aggregation of hazardous waste release sites. It is expected that WAGs will generally evolve from hydrogeological considerations, but regulatory and administrative considerations may also be involved. Cost accountability to Headquarters (HQ) below the defined task level is not required.

As with the task-level definition, the WAG-level definition still leaves the field office significant flexibility. The guiding consideration must be adequate definition of work to provide HQ with the information necessary for rapid, perhaps on-the-spot, responses to the DOE ES&H organization, the OMB, and Congress.

Allowing tasks to be redefined as remedial actions work progresses introduces the need for a recognizable, unchanging element in the WBS. The ultimate tracking level for remedial actions is the hazardous waste release site. This is the level at which hazardous waste action identity is firmly established. This WBS level is the bedrock for remedial action identity; tasks must always be linked with sites. No HQ reporting is required at this level, but HQ must annually be supplied with a listing of sites associated with each WAG and WAGs associated with each task (i.e., a definitive WBS for each task). These task WBSs should be included in the Field Office Current Year Work Plan (FOWP).

The remedial actions phases shown at Level 3 in the WBS provide roll-up information for HQ. Although reporting is not required at this level, tasks must be associated with these regulatory phases to allow the roll-up. As an identified task moves from one regulatory phase to the next, it may remain intact, it may be subdivided into several new tasks, or it may possibly be aggregated with one or more existing tasks to form a single new task. In any case, when the task is redefined, identity must be reestablished by respecifying the link to the release sites. Thus, any release site can be tracked through the remediation process by its association with the progress of a task or series of tasks.

4.2.2 Prioritization

Broadly, tasks will be prioritized according to four sets of criteria -- public health risk, environmental risk, regulatory concerns, and program/operational impacts -- as detailed in Table 4. The EH environmental survey results and ranking of the associated findings will

Table 4. Criteria for scoring mainline Remedial Actions tasks

Criterion	Task
Public health risk	Release/public exposure potential
Environmental risk	Groundwater classification
	Sensitive environment
	Current/future land use
	Endangered species
	Release potential
Regulatory concerns	National Priorities List inclusion
	Statutory requirements
	Permits/compliance agreements
	National Resources Defense Act
	Regulations
	Department of Energy orders
	Other institutional concerns
Program/operational impacts	Mission impact (national security)
	Employee health and safety
	Economy of scale
	Length of remediation

be used in the prioritization. To ensure consistent application, the same prioritization system will be used by HQ and the field offices. It is anticipated that ER Program funding needs will be in transition and, thus, are expected to exceed the Congressional appropriation for a number of years. Therefore, some remedial actions tasks may have to be postponed or completed more slowly. Many factors will have to be assimilated to achieve the simple (i.e., single) objective of maximizing external and internal acceptance and approval of budgeting decisions that postpone or delay mandated work. This situation results in a complex, dynamic, multiattribute, decision-analysis problem involving resource allocation.

Development of an ER Program prioritization system is under way. Field office input to the system will be an integral part of its development. Until the study is completed and a system for implementation is recommended, further discussion of the details of the prioritization system that will be used is beyond the scope of this document. It is intended that the system will be fully documented and implemented for the FY 1990 budget cycle.

4.2.3 Budget

The ER Program budget will be developed on the normal annual DOE budget cycle. The Remedial Actions part of the ER Program budget will consist of four categories:

1. The mainstream remedial actions budget, which will be subject to DP-wide prioritization at the WBS task level.
2. A modest, unprioritized program management support budget for long-range planning, program management, and community relations activities. The level of this budget element for each field office will be set by HQ.
3. A HQ-controlled contingency fund of 5% of the total program budget mark, the residual of which would be allocated in full to the field offices during the third quarter of each fiscal year.
4. A modest, unprioritized fixed sum allocation for technology development and demonstration, the amount to be set by HQ each fiscal year.

A description of each category follows.

Mainstream Remedial Actions Category. The bulk of the Remedial Actions funding allocation will go to actual field tasks directly related to remediating DP inactive hazardous waste release sites or potential release sites. As described in Sect. 4.2.1, the task elements are the basic planning units for the ER Program. Tasks will be identified and

defined by the field offices. It is expected that the descriptions will begin to emerge in the field office ER Program Long-Range Environmental Management Plan and will reach maturity in the annual Budget Year+1 ER Program Budget Response Package.

Each field office will prepare an annual Budget Call Response Package and submit it to HQ (DP-124). This package will include a prioritized listing of all activities needed to comply with all regulatory requirements that the ER Program addresses, regardless of the aggregate cost. The Budget Call Response Package will include a Prioritization Data Sheet for each proposed task and a Field Office Budget Request Summary Form (see Appendix B for examples of the forms to be used.)

Field office prioritized task lists will be merged by a standing task group consisting of DP-124 representatives and the ER Program representative from each field office. This task group will use the same priority system that was used at the field office level. The task group's primary function will be to ensure that task-weighted scores generated by the field offices have been consistently determined. If not, the task group, through negotiations with field office managers conducted by its field office members, will make necessary modifications to enable a group consensus that the priority for each task represents its value to the DP enterprise. The final prioritized ER Program task list will be submitted to DP-12 for approval and used as the basis for funding determinations throughout the budget process. Field office tasks on this final list are considered "approved." This list and its supporting task descriptions will make the complete DP environmental restoration need visible and available for consideration by all parties effecting the DP budget process.

Program Management Support Category. Recognizing that certain support functions benefit all ER Program activities, HQ will allocate modest funding for such work as long-range planning, program management, and community relations. This allocation will not be considered in the

mainstream task prioritization process. The funding level is intended to maintain ER Program continuity and capability at the field office level and will be commensurate with the total scope of the ER Program at each field office.

Contingency Fund Category. DP-124 will maintain a current year contingency fund until the third quarter of the fiscal year. The initial amount of this fund will be 5% of the total ER Program budget. This fund will be used to meet unforeseen or emergency situations demanding immediate attention.

Technology Development and Demonstration Category. Technology development and demonstration needs will, in many cases, be shared by field offices. To ensure cost-effectiveness in meeting these needs, they will be addressed on a DP-wide basis. A standing task group consisting of DP-124 representatives and the ER Program representative from each field office will review proposed development and demonstration tasks submitted in the Budget Call Response Package and rank these tasks using an appropriate prioritization system. This funding allocation will not be prioritized with mainstream tasks.

4.2.4 Authorization

As described in Sects. 4.2.2 and 4.2.3, a prioritized list of all proposed DP ER Program tasks will be developed as part of the normal annual DOE budget process. This budget list, along with supporting task prioritization data sheets and other pertinent information, will be available to support Congressional funding requests.

Once ER funds have been appropriated, they will be distributed to the field offices in accordance with the ER Program-level prioritized list. Tasks are "authorized" through this budget/funding process. Once approved and authorized, ER Program tasks will be managed at the field office level.

New tasks that may require unplanned funding support during the year may be addressed in one of two ways. Monies may be transferred between approved tasks within an individual field office budget, as long as the overall field office program budget for the fiscal year is not exceeded, or the field office may request supplemental funds from HQ. All new starts must be approved by the appropriate HQ manager as designated in Table 5.

4.2.5 Change Control

Though it is expected that approved ER Program tasks will generally conform to cost and schedule baselines, the nature of ER tasks in the pre-ROD phases makes changes in scope of work inevitable. A key to successful management of remedial tasks is the establishment of effective control of work scope changes. Additional work scope needs that arise should be addressed as a new task subject to the provisions for management approval described in Sect. 4.2.4 rather than as an expansion of the scope of existing tasks.

Small (less than variance thresholds specified in Table 5) changes in funding between approved tasks can be made at the field office level, as long as the total funding requirements do not exceed the field office ER budget. Notification of the changes, along with a brief justification, must be provided to DP-124 in the next monthly status report after the change is made. Similar flexibility and notification requirements are applicable to schedule changes in tasks below the HQ milestone reporting level, unless they exceed a slippage of 3 months.

Changes in either task TEC or schedule that exceed the variance thresholds specified will require DOE management approval as indicated in Table 5.

Table 5. Environmental Restoration Program accountability^a

Task hierarchy (YH)	New start authorization	Variance		Approval
		Cost	Schedule	
>200	ASDP (DP-1)	3% TEC	≥ 1 month for HQ milestone ≥ 3 months for other milestones	DWH (DP-12)
50-200	DWH (DP-12)	5% TEC	≥ 1 month for HQ milestone ≥ 3 months for other milestones	DWH (DP-12)
15-50	DWH (DP-12)	7% TEC	≥ 1 month for HQ milestone ≥ 3 months for other milestones	IWRAD (DP-124)
<15	IWRAD (DP-124)	10% TEC	≥ 1 month for HQ milestone ≥ 3 months for other milestones	IWRAD (DP-124)

^aASDP = Assistant Secretary for Defense Programs
 TEC = Total Estimated Cost of Task
 HQ = Headquarters
 DWH = Office of Defense Waste and Transportation Management
 IWRAD = Hazardous Waste and Remedial Actions Division.

4.2.6 Documentation

ER Program documentation consists of three general types:
(1) planning documents, (2) status reports, and (3) regulatory agency documents.

The general purpose of program-level documents is given by document type in the following subsections. Table 6 shows submittal, review, and approval requirements for each document.

4.2.6.1 Planning Documents

ER Program Plan. The purpose of this Plan is to present a total delineation of Program activities, funding, and objectives based on current year information. The Plan will document Program requirements for the current fiscal year and future projections to the extent possible, using current Field Office Long-Range Plans, budget packages, FOWPs, and environmental baseline data from the environmental survey.

The ER Program Plan will provide assurance that the ER Program tasks are effectively planned. The Plan will contain the following:

1. Program Objective - reconfirm or readdress the objective of the ER Program toward meeting its mission.
2. Program History - address regulatory drivers of the program, ER Program development history, and overall accomplishments.
3. Task Description - provide listing and brief description (in order of Program priority) of all current fiscal year tasks and tasks defined for long-range inclusion in the ER Program.
4. Task Schedules - include task-level summary bar charts for current fiscal year and long-range plans so that a total Program, time-based view can be developed, actual start dates for tasks can be initiated before the current fiscal year, and completion dates

Table 6. Environmental Restoration Program documentation^a

Type	Frequency	Field office	IWRAD	DWTH	ASDP	ASEH
I. Planning						
Program Plan	[A]	I	P	R	A	I
Program Management Plan	[O]	I	P	A		I
Field Office Management Plan	[O]	P/HA	R			I
Field Office Long-Range Environ. Management Plan	[A]	P/HA	R	I	I	R
Field Office Current Year Work Plan	[A], [O]	P/HA	R			
Field Office Budget Request Summary ^b	[A]	P	R	A		I
Prioritization Data Sheet ^b	[A]	P	R	A		I
II. Status Reports						
Monthly Field Office Status Report ^b	[M]	P	R			I
Monthly Management Summary Status Report	[M]	I	P	I		I
Annual Field Office Status Report ^b	[A]	P	R	I	I	I
Annual Management Summary Status Report ^b	[A]	I	P	I	I	R

^aIWRAD = Hazardous Waste and Remedial Actions Division, DWTH = Office of Defense Waste and Transportation Management, ASDP = Assistant Secretary for Defense Programs, ASEH = Assistant Secretary of Environment, Safety, and Health, [A] = annual, [O] = one-time or as required, [M] = monthly, P = prepare, R = review, A = approve, I = information, HA = Field office manager approval.

^bCopy of document form is contained in Appendix B.

and milestones can be projected for all identified tasks (current and long range).

5. Program Budget - provide total budget breakdown by task for the current fiscal year, actual prior-year expenditures, and future projected needs based on current information.
6. Assumptions - list all key assumptions that have potential program impact, such as schedule, cost estimates, site characterizations, regulatory actions/agreements, and mission impacts.

ER Program Management Plan. The purpose of the ER Program Management Plan is to define administrative and management systems required to ensure focused, consistent, accountable, and effective actions toward the accomplishment of ER Program objectives. It differs from the Program Plan in that it represents a guidance document for implementation of the Program's components.

Field Office Management Plan. The purpose of the Field Office Management Plan (FOMP) is to define the task-level administrative and management procedures at each field office necessary to comply with the guidance and requirements of the ER Program Management Plan, additional requirements of regulatory agencies, and local agreements. The FOMP will include or reference all procedures necessary to ensure that field office activities and tasks are managed and implemented consistent with the objectives of the ER Program. FOMPs will contain guidance and procedures for the following:

1. Management Plan Objectives - state the objectives of the FOMP relative to the ER Program Management Plan requirements and additional field office needs.
2. Field Office Roles, Responsibilities, and Authority - address the specific identification of roles, statement of responsibilities, and limits of authority of applicable field office and support organizations relative to the level of direct control by the field office.

3. Task Planning and Budgeting - document or refer to procedures as required to define appropriate actions for task initiation, planning, WBS, budgeting allocations and reallocations, planning, estimates, task prioritization, and applicable review and approval requirements.
4. Task Execution and Control - document field office management procedures for execution and control of tasks that include cost estimating, network scheduling, quality assurance, task status reporting, correspondence, and additional procedures as required.
5. Status Assessment and Reporting - include guidelines for assessing change recognition, cost projection, schedule status, milestone status, problems, report preparation, and communication of data.
6. Documentation Requirements - list and supply or refer to procedures for the production, maintenance, and communication of all documents required by ER Program activities and field office management practice.

Field Office Long-Range Environmental Management Plan. The purpose of the Field Office Long-Range Environmental Management Plan (FOLRP) is to present an up-to-date view of requirements for the current year and for out years. The FOLRP will reflect to DP the latest projections on required anticipated tasks, funding requirement estimates, and schedule target milestones to be used by DP for long-range program planning and development of the ER Program Plan. The FOLRP will provide long-range planning information consistent with the currently defined objectives of the ER Program. FOLRPs will contain the following:

1. Task Identification - a listing and a brief description of all currently identified tasks for which work is planned in the current fiscal year and out years.
2. Additional Action Identification - a listing of any additional actions that will be developed into tasks for the out years.
3. Schedules - summary-level bar charts indicating start and completion projections for all planned tasks and current projected

milestones for each task with the indicated progress and actual start dates.

4. Funding Projections - total task and projected task cost estimates, current site characteristics, and regulatory actions/agreements as required to allow DP to make long-range funding projections.
5. Implementation Requirements - long-range requirements projection information necessary to implement projected tasks, including field office resources, contracting methods, systems development, and potential technology demonstration needs.

Field Office Current Year Work Plan. The purpose of the FOWP is to document the basis for planning and implementing the current year ER Program at the field office level.

The annual FOWP submittals will be consistent with the budget cycle and other HQ and field office requirements. The FOWP will focus on the upcoming fiscal year, but will also include information on tasks extending beyond the current fiscal year. Once the FOWP has been submitted and approved as outlined in Table 6, any proposed changes to the plan must be documented in a revision to the FOWP and approved before implementation. HQ approval of changes to a previously approved FOWP will be required in accordance with Table 5.

FOWPs will provide assurance that program tasks leading to completion of compliance milestones and commitments are effectively planned. To accomplish this, FOWPs will contain the following:

1. Task Identification - a listing and brief description of all current fiscal year tasks.
2. Task Schedules - major supporting tasks and key milestone bar charts, actual start dates for tasks initiated before the current fiscal year, and projected completion dates and milestones for those tasks that extend beyond the current fiscal year.

3. Task Budoets - total task planning estimates, site characteristics, and regulatory actions/agreements.
4. Maps - installation maps that identify release site locations, WAGs, and other pertinent physical factors.

Prioritization Data Sheet. Each field office will supply information for each proposed task as part of the Budget Call Response Package. As outlined on the form included in Appendix B, the data sheet will provide information required for prioritization of each proposed task at the field office level. Key specific information requirements are as follow:

1. Task Description - include title, task identification number, and narrative description.
2. Objective/Justification - include what the task is intended to accomplish and the justification for the task and where the justification is based on statutory/regulatory requirements, regulatory agency compliance agreements, and memorandum of understanding. The drivers are to be clearly identified.
3. Field Office Priority - provide the numerical value developed in the field office prioritization activity.
4. Risk Assessment - summarize assessed risks to public health and the environment.
5. Program/Operational Impacts - identify current and/or potential impacts on ongoing facility operations as a consequence of an identified release from a hazardous waste site.
6. Consequences - identify and describe specific consequences if the proposed task is not funded.

Field Office Budget Request Summary. Each field office will submit a prioritized summary of its proposed tasks for the upcoming fiscal year on the form included in Appendix B. The form includes the title of the proposed tasks, task identification number, scheduled start and completion dates, fiscal year, fiscal year +1 and fiscal year +2 budget estimates, and a cumulative summation of the task fiscal year budget estimates.

4.2.6.2 Management Status Reports

For ER Program credibility, it is essential that a consistent, accurate picture exists in all ER reporting. A reports or documentation management control system must be addressed in each FOMP to ensure that this consistency is maintained internally and by contractors and/or subcontractors.

ER Program Management Reports. Program management reports necessary to communicate information to all levels of ER management include: Field Office Monthly Status Reports,* Monthly Management Summary Status Reports, Annual Field Office Status Reports,* and Annual Management Summary Status Reports. Because reports serve as the mainstream of program communication, they should be brief, concise, and accurate. Additional details regarding these reports are provided below.

Field Office Monthly Status Report. A monthly status report from each field office will report by task the previous month's status, major milestones status, cost (TEC) baseline and status, schedule baseline and status, significant successes or problems, and significant current or anticipated deviations from plans or unplanned events. A manager's assessment of task percent completion can be compared with the established baseline and will provide an essential tool for measurement of progress and trend analysis. Status reports will be submitted to HQ HWRAD, with parallel copies to the HAZWRAP SCO, no later than the 15th calendar day of each month.

Initial submittals will be hard copy, but future plans provide for electronic data input through the DOE Waste Information Network (WIN) system. Limited system access will control information input and availability.

*Appendix B contains forms for the Field Office Monthly Status Reports and Annual Field Office Status Report.

Monthly Management Summary Status Report. The status reports previously discussed will be used to compile an overview summary report for HQ and field office use. The SCO will perform this effort under HWRAD guidance and will address programmatic aspects of similar subjects as identified at the field offices.

Annual Field Office Status Report. This annual report requires field offices to provide their overview summary of the status of each ER task in terms of cost, schedule, technical items, expectations, or significant issues for the future, with technical and management assessment.

Annual Management Summary Status Report. This report will consist of a roll-up of the monthly reports and will provide details on subjects such as milestones and cost per month and overview information on significant program-level accomplishments and trends. The report will be prepared by the SCO and submitted to ER Program management and field offices by the end of January.

4.2.6.3 Regulatory Agency Documents

The field offices will prepare a number of documents to meet the requirements of environmental statutes, regulations, compliance agreements, and other agreements with federal, state, and local regulatory agencies. These documents are not required as a direct result of stated Management Plan requirements, but they are important to ER Program management because they affect compliance issues, commitment of resources, and funding requirements. It will be the responsibility of the individual field offices to negotiate agreements with the local regulatory authorities and to produce agreed-upon documentation. Field offices should recognize, however, that HQ ER Program management must be consulted on these agreements because they may affect DOE policy, resource commitments, and funding requirements. In some instances, HQ-DP will request to be involved in the review, concurrence, and approval of these documents. Because of the large number of documents involved and the

varied requirements between field offices and local regulators, decisions on HQ involvement will be determined on a case-by-case basis.

The following are typical of key documents required by the regulatory process that may necessitate consultation with HQ: draft ROD, Compliance Agreement, Memorandum of Understanding, and Notice of Intent.

4.2.7 Data Base

At present, a general management data base is planned to support HQ management of the Program that will provide overall as well as field office summaries of the Program and will be capable of answering, as a minimum, questions about potential hazardous waste site releases, each phase of the RCRA/CERCLA remediation, and/or the overall ER Program. Specific requirements and guidance will be provided at a later date.

4.3 REMEDIATION TECHNOLOGIES

4.3.1 Assessments

An ER Program goal is to remediate hazardous waste sites with the most cost-effective, efficient, and environmentally acceptable remediation technology available. When adequate technology is not available, technology research and development and/or demonstration projects must be generated. These projects will be sharply focused on specifically identified needs, and progress will be carefully evaluated through each phase from concept development, research and development (R&D), pilot-scale testing and demonstration to technology transfer. Funding, coordination, and reporting will be considered separately from regular ER task management.

4.3.2 Research and Development

In situations where no commercial technology appears to have immediate potential for solving a specifically identified remedial actions need, identification of an R&D task will be established. The intent of these tasks is to accelerate commercial application of remedial technologies. HQ will solicit DP facilities for proposals to provide support to the R&D task. Private companies and institutions, colleges, and universities will also be considered for developing joint efforts, managed by appropriate DP laboratories and facilities, to help eliminate duplication of effort and minimize the time and funding required to develop an acceptable solution for commercial application.

4.3.3 Demonstrations

Remedial actions technology large-scale demonstration is necessary for any unproven technology before it is used in a full-size application. The demonstration will be designed to test the effectiveness of the proposed technology in handling the waste of concern on a reasonably large scale and to establish preliminary cost estimates for the total process. While complete remediation of a site is the ultimate goal of the ER Program, it is not the immediate goal of projects supported by ER Program technology demonstration. The scope of the individual demonstrations will be limited to that necessary to prove that the technology provides acceptable results on the scale required for remediation. Demonstration sites will be selected from the interested field offices. Field office management and funding will be determined as part of the selection process.

4.3.4 Technology Transfer

Technology transfer, the information transfer for R&D or demonstrations in the ER Program, is provided by two methods:
(1) meetings, which consist of presentations to technical organizations,

professional societies, and at internal workshops; and (2) written documents, which consist of publications in journals, other referenced publications, and status reports. Technology transfer will allow a variety of field offices to capitalize on their individual efforts.

5. QUALITY ASSURANCE

DOE Order 5700.6B and EPA (RCRA/CERCLA guidance) quality standards define the requirements that must be met for quality assurance (QA) in the ER Program. QA systems are already in place at DOE field offices. In addition to DOE requirements, specific quality measures to support environmental activities must be identified before EPA acceptance of work plans.

Field offices, with the assistance of EH, must identify how they will implement, maintain, and assign responsibility to ensure quality in the management of the ER Program. The system should be clearly visible and consistent in FOMPs and FOWPs. General field office or contractor quality procedures may be referenced, but specific actions and controls directed toward the ER Program must exist.

The ER Program Plan will provide the system for defining QA in all ER Program-level management areas.

GLOSSARY

Assessed value: A means of assessing the value of work performed rather than actual cost. Assessed value is used in monthly status reporting for trend analysis and is calculated as the product of the manager's assessment of percent complete times the task total estimated cost.

Baseline: A quantitative definition of task scope, total estimated costs, schedule, or technical progress that serves as a base or standard for measurement during the performance of an effort; the established plan against which the status of resources and the effort of a task can be measured and assessed. Once established, a baseline is subject to change control procedures.

Costs to date: Costs incurred to date by the contractor and reported to the Department of Energy (DOE) that are recorded as accrued costs and represent all charges incurred for goods and services received and other assets required, regardless of whether payment for the charges has been made. This includes all completed work and work in process chargeable to the contract. Accrued costs include invoices for (1) completed work to which the prime contractor has acquired title, (2) materials delivered to which the prime contractor has acquired title, (3) services rendered, (4) costs billed under cost reimbursement or time and material subcontracts for work to which the prime contractor has acquired title, (5) progress payments to subcontractors that have been paid or approved for current payment in the ordinary course of business (as specified in the prime contract), and (6) all fee profit charged to the contract.

Demonstration: The verification of scale-up, economic, and environmental viability for commercial or developmental remedial action technology application through design, construction, testing, and evaluation of large-scale systems in operational circumstances.

Development: The development and test of systems and pilot plants judged to be technically and economically desirable as a means of achieving principal ER Program goals. Engineering development concerns itself with processes, preproduction components, equipment, subsystems, and systems. Initiation of work in this category is dependent upon successful demonstration of technical feasibility and economic potential during the technology phase. (Also called research and development).

Facility: A building and its functional systems and equipment, process systems and associated piping, landfills, and impoundments. A facility is usually associated with a unique process or operation at a given location.

Hazard Ranking Score: A numeric estimate of the relative severity of a hazardous substance release or potential release based on (1) the relative potential of substances to cause hazardous situations, (2) the likelihood that and the rate at which the substances may affect human and environmental receptors, and (3) the severity and magnitude of potential effects. The score is computed using the Hazard Ranking System.

Hazard Ranking System (HRS): A model developed and designed to provide an estimate of the relative severity of a hazardous substance release. The HRS computes a score, from 1 to 100, for each potential or actual release site, which serves as an input to the Environmental Protection Agency

(EPA) decision of whether inclusion on the National Priorities List should be performed and, if so, at what ranking compared with that of others on the list.

Hazardous Substance (statutory definition): Also referred to as hazardous waste, it is defined as (1) any substance designated pursuant to Sect. 311 (b)(2)(A) of the Federal Water Pollution Control Act; (2) any element, compound, mixture, solution, or substance designated pursuant to Sect. 102 of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); (3) any hazardous waste having the characteristics identified under or listed pursuant to Sect. 3001 of the Solid Waste Disposal Act (SWDA) (but not including any waste the regulation of which under the SWDA has been suspended by Act of Congress); (4) any toxic pollutant listed under Sect. 307(a) of the Federal Water Pollution Control Act; (5) any hazardous air pollutant listed under Sect. 112 of the Clean Air Act; and (6) any imminently hazardous chemical substance or mixture with respect to which the Administrator (of EPA) has taken action pursuant to Sect. 7 of the Toxic Substances Control Act. The term does not include petroleum, including crude oil or any fraction thereof that is not otherwise specifically listed or designated as a hazardous substance under subparagraphs 1-6 of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

Memorandum of understanding (MOU): An agreement between EPA and another agency (federal, state, or local) that sets forth basic policies and procedures governing their relationship on matters of mutual interest and responsibility. There is no exchange of funds under this type of agreement.

Obligated cost: Funds that have not yet been charged to the account but have a documented record that they were/are committed (e.g., an approved subcontract that is working and has a fixed end date identified and specific funds promised would be obligated funds for the entire subcontract value even though no actual costs have been incurred.)

Planning estimate: A cost estimate for general planning and budgeting purposes only. Planning estimates will be used when there is a need for an order of magnitude estimate, but sufficient definitive information is lacking that would allow the development of a total estimated cost.

Record of Decision (ROD): A decision document for an EPA- or state-lead project that (1) documents decision-making, (2) shows decision-making consistency with CERCLA and the NCP, and (3) supplements the feasibility study if necessary. The ROD is equivalent to the Compliance Agreement in a federal agency lead project.

Release: As defined by Sect. 101(22) of CERCLA, as amended, means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching; dumping, or disposing of into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substances, pollutants, or contaminants), but excludes any release that results in exposure to persons solely within a workplace, with respect to a claim that such persons may assert against the employer of such persons; emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine; release of source, by-product or special nuclear material from a nuclear incident, as those

terms are defined in the Atomic Energy Act of 1954, if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Sect. 170 of such Act, or, for those purposes of Sect. 104 of CERCLA, as amended, or any other response action, any release of source, by-product, or special nuclear material from any processing site designated under Sect. 102(a)(1) or 302(a) of the Uranium Mill Tailings Radiation Control Act of 1978; and the normal application of fertilizer. For the purposes of this Plan, release also means substantial threat of release.

Release site: A location at which a hazardous waste release has occurred or has the potential to occur. It is usually associated with an area where the hazardous substances have been treated, stored, and/or disposed of. A site is the lowest element in the Program hierarchy for which a task will be defined.

Remedial action: A subactivity (CERCLA term) in a remedial response involving actual implementation, following remedial design, of the selected source control and/or off-site remedial effort.

Risk assessment/health: The potential for realization of unwanted negative consequences or events. Public health risk assessment is a quantitative or qualitative evaluation of data from sources, such as toxicology and epidemiology, to predict the effects of public exposure to environmental factors that pose a potential hazard to the health and well-being of the public. Environmental and/or health effects resulting from exposure to a chemical or physical agent (pollutant) are combined with toxicity assessment results to provide an overall estimate of risk to

the public. The process includes identification of the threat's source, determination of the threat's potential extent, or magnitude and resolution of probability that the defined undesirable situation will ensue from the exposure. Risk estimate is a description of the probability that organisms exposed to a specific dose of chemical will develop an adverse response (e.g., cancer).

Scope Change: A change in task objectives, plans (project or fieldwork), or schedule that results in a material difference from the terms of an approval to proceed previously granted by higher authority. Under certain conditions, change in resources application may constitute a change in scope.

Task: A unique entity within the ER Program that has clearly defined beginning, intermediate, and ending milestones. A task is the basic building block in the Program, and as such, is individually planned, approved, and managed. A task may consist of a number of supporting subtasks, including various dissimilar activities, but it is characterized by a common purpose or goal.

Total estimated cost (TEC): An estimate of the total cost of a task, demonstration, or program. The TEC differs from a planning estimate in that it is based on definitive information regarding technical scope, contracting methods, schedule, and resource requirements. As such, once a task is approved, its TEC is baselined and becomes subject to the change control procedures specified in Sect. 4.2.5 of this Plan.

Waste area group (WAG): A grouping of facilities and/or release sites with area-wide groundwater contamination that is not readily traceable to individual facilities or sites. Generally, a WAG would be limited to a geographically contiguous and hydrologically defined area.

ENVIRONMENTAL RESTORATION PROGRAM

___ of ___

FIELD OFFICE MONTHLY STATUS REPORT

MONTH / YEAR ___/___

TASK NO. : ___

F.O. : _____ CONTRACTOR : _____ TASK LOCATION: _____

TASK MANAGER : _____

TITLE : _____

TED \$: _____

RCRA/CERCLA : _____

NO. OF POTENTIAL

RELEASE SITES : _____

PLANNING EST \$: _____

TASK PHASE : _____

(PA/SI, RI)/FS, RA,
DEMO, R&D, etc.)

SUSPECT WASTE : _____

FY BUDGET FOR ___ : _____

TASK DESCRIPTION/OBJECTIVE : _____

STATUS : _____

MANAGERS ASSESSMENT OF % COMPLETE : ___ %

PROBLEMS (Monthly Only)

1. STATEMENT OF PROBLEM : _____

IMPACT (budget/milestone) : _____

CORRECTIVE ACTION/DATES/RESPONSIBLE : _____

2. STATEMENT OF PROBLEM : _____

IMPACT (budget/milestone) : _____

CORRECTIVE ACTION/DATES/RESPONSIBLE : _____

(ADDITIONAL PROBLEMS SHOULD BE ADDRESSED IN THE ABOVE FORMAT AND ATTACHED)

NO. OF PAGES ATTACHED
TO REPORT : ___

(MONTHLY)

SIGNATURE OF PREPARER _____

TASK TITLE :

FIELD OFFICE MONTHLY STATUS REPORT

COST REPORT SHEET

TASK TITLE :

TASK NO. :

[illegible]

C U M U L A T I V E C O S T S

3-3

SEP	AUG	JUL	MAY	APR	FEB	MAR	DEC	NOV	OCT
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[illegible]

CIM BUDGET
CIM SPENDING
CIM ASSESSED VALUE

ASSUMPTIONS:

• FY 1991 ARS

10

1/A/111

FIELD OFFICE MONTHLY STATUS REPORT

TASK NO. :

MAJOR MILESTONE REPORT SHEET

[illegible]

• MILESTONES THAT IDENTIFY MAJOR ASSUMPTIONS:

TASK COMPLETIONS INCLUDING

IPA LINK ACTIVILIS.

10

iii/v/i

FIELD OFFICE MONTHLY STATUS REPORT

TASK NO. :

MAJOR SCHEDULE REPORT SHEET

[illegible]

of

ENVIRONMENTAL RESTORATION PROGRAM

ANNUAL FIELD OFFICE STATUS REPORT

Task No: _____ Title: _____

Field Office: _____ Contractor: _____ Report Period: _____

RCRA/CERCLA Phase: _____ CY Budget Allocated: _____ Expended: _____

Current Overall Status: _____

_____Documentation Submitted: _____

_____Status of Cost: _____

_____Status of Schedule: _____

_____Status of Technical Effort: _____

_____Overall Technical Assessment for Period: _____

_____Overall Management Assessment for Period: _____

_____Special Future Needs: _____

_____Future Projections: _____

Signature/Date of Preparer: _____

ENVIRONMENTAL RESTORATION PROGRAM

PRIORITIZATION DATA SHEET

Field Office _____ Prog. Mng.: _____ Location/Contractor: _____

Task Title _____ Task No. _____

Description of Task: _____

_____Objective/Justification: _____

Suspect Waste: _____

Task Manager: _____ TEC: _____ Is Task approved? _____

Date of Initial Task Definition/Submittal: _____

Previous Funded Value? _____ Year: _____

Current Year Funds Allocated Value: _____

Current Year Funds Obligated Value: _____

CERCLA/RCRA: _____ Phase (PA/SI, ..., R&D, Demo., etc.): _____

Field Office Priority Value Assignment _____ HRS Value _____

Release Sites Involved Number/Identity _____

Public Health Risk

Release/public exposure potential _____

ENVIRONMENTAL RESTORATION PROGRAM

PRIORITIZATION DATA SHEET (cont.)

Task No. _____

Environmental Risk

Groundwater classification: _____

Sensitive environment: _____

Current/future land use: _____

Endangered species: _____

Release potential: _____

Regulatory Concerns

NPL inclusion: _____

Statutory requirements: _____

Permits/compliance agreements: _____

NRDA: _____

Regulations: _____

DOE orders: _____

Other institutional: _____

Program/Operational Impacts

Mission impact (national security): _____

Employee health and safety: _____

Specific Consequences if Not Funded _____

Supporting Detail Documents Submitted (Title/Document No./Date)

Preparer's Signature/Date: _____

FIELD OFFICE :
ER PROGRAM MGR :

[illegible]